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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. CR 21-00164 CRB
Plaintiff,	)	STIPULATION AND <del>[PROPOSED]</del> PROTECTIVE
v.	)	ORDER
DOUGLAS JAE WOO KIM,	)	
Defendant.	)	

**STIPULATION**

The United States and the defendant in this action, through undersigned counsel, hereby stipulate and agree as follows:

1. The United States is prepared to produce to the defendant grand jury testimony from this investigation in advance of trial.
2. Federal Rule of Criminal Procedure 6(e)(3)(E) provides that the Court “may authorize disclosure – at a time, in a manner, and subject to any other conditions that it directs – of a grand-jury matter: (i) preliminary to or in connection with a judicial proceeding.” The parties request that the Court issue an order authorizing such disclosure.

- 1 3. Possession of copies of the testimony shall be limited to the defendant and his attorneys,  
2 including any investigators, paralegals, law clerks, assistants, and other persons who are within  
3 the attorney-client privilege (hereinafter collectively referred to as “members of the defense  
4 team”). The defendant, his attorneys, and members of his defense team shall use the testimony  
5 only for the purpose of defending against the allegations in the Superseding Indictment. The  
6 defendant, his attorneys, and members of his defense team shall not provide copies of the witness  
7 statements and reports to other persons.
- 8 4. At the conclusion of this proceeding, the defendant, his attorneys, and members of his defense  
9 team shall return to the government all copies of the witness statements and reports.

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11 DATED: December 5, 2022

Respectfully submitted,

12 STEPHANIE M. HINDS  
13 United States Attorney

14  
15 /s/  
ROSS WEINGARTEN  
16 Assistant United States Attorney

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18 DATED: December 5, 2022

19 /s/  
DEAN PAIK  
20 Counsel for Defendant  
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~~(PROPOSED)~~ ORDER

In light of the stipulation and agreement of the parties to this action, and good cause appearing, it is HEREBY ORDERED that the United States is authorized to disclose grand-jury matters to the defendant, including certain grand jury testimony. It is FURTHER ORDERED that use of any grand jury testimony produced by the United States shall be restricted as set forth in Paragraphs 3 through 4 above.

DATED: December 5, 2022

  
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HONORABLE CHARLES R. BREYER  
United States District Court Judge